## REMARKS

Applicants respectfully traverse and request reconsideration.

Claims 1, 5-12, 14-22, 25, 27 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over Liu, et al. (hereinafter "Liu") ("XWRAP: an XML-enabled wrapper construction system for Webinformation source", Proceedings of the 16th International Conference on Data Engineering, Publication Date: 2000, pgs. 611-621) in view of Keith (Patent Number 6,629,097). This is a new ground of rejection.

The Liu reference is directed to an XML-enabled wrapper construction system that generates wrapper programs in a semi-automatic manner (abstract). The system extracts information in original web pages and encodes, metadata explicitly in XML tags in wrapped documents. A query is then performed against the XML documents (see abstract, second paragraph). The approach described in Liu is for HTML-based web information. As best understood, the cited portions referred to a system where only a single format of documents can be employed, namely, information that is already in HTML format.

As to claim 1, the claim requires specific operations and information not set forth in the Liu reference as alleged. The Office Action alleges that the Liu reference teaches in the cited portion, a first data descriptor item linked to data and a link to the data item with the second data descriptor item wherein the second data descriptor item is in the form of at least a data access instructions descriptor that provides instructions on how to access the raw data in the raw data item. The Office Action cites pages 3-4, section 2.1 and page 15 (Applicant's believe it is actually page 14), section 14.3, fourth paragraph and indicates that the "XML templates" correspond to the claimed data access instructions descriptor that provides instructions on how to access the raw data in the raw

data item. Applicants respectfully submit that the Liu reference does not teach the claimed subject matter.

The cited portion actually refers to "XML templates" which as stated in the cited portion are:

> ". . . well formed XML files that contain processing instructions. Such instructions are used to direct a template engine to the structural placeholders where data fields should be inserted into the template." . . . It looks for a field with a specified name . . . and inserts that data at the point of the processing instruction."

As evidenced from the quote above, the XML template described in Liu actually refers to "instructions" that are used to direct a template engine to find where data fields are inserted into the template. This has nothing to do with instructions on how to access raw data in a raw data item nor does it have anything to do with how to access data as a raw data item, but instead are "instructions . . . to direct the template engine to the special placeholders where data fields should be inserted into the template." In contrast, the claimed data access instruction descriptors as set forth in the Applicants' specification (see paragraph 052), for example, may be a textual description instructing how to access or otherwise manipulate or use the information stored in the raw data item, such as "raw data for drop test video P2K-1234.ABI are stored in the lab data directory under the same name." The data can also be computer readable instructions that can include direct transfer code or processing transfer code and may include code that provides filtering or mapping of elements in the raw data item to elements on the data access instruction descriptor. The cited portion of Liu does not describe the <u>data access instruction descriptors that provide instructions on how to access raw data</u>, but to the contrary, as specifically set forth direct the template engine to special placeholders where data fields should be inserted into the template. As such, the instructions in the Liu reference are not

data access instruction descriptors but the actual instructions needed to populate an XML template. These instructions are used to insert data at a particular point in a template. As such, the Liu reference does not teach the claimed subject matter.

Applicants respectfully reassert the remarks above for other independent claims containing similar language and, as such, these claims are also in condition for allowance.

As to independent claim 28, the claim requires, among other things, that the executable instructions cause the processor to generate a plurality of knowledge modules for the raw data item by analyzing information in the raw data item wherein the plurality of different knowledge modules are in different formats. As such, a single raw data item is analyzed and based on that, different knowledge modules in different formats are generated. In contrast, the Liu reference requires the data to be analyzed, namely an HTML document, to be in a single HTML format. The cited portion in Liu section 4.3, third paragraph, does not refer to different knowledge modules that are in different formats based on analyzing raw data but, to the contrary, refer to formatting rules. This is a different use of the word "format". The rules are all in the same format, namely, a rule script "expressed in an XML compliant template for the page." As such, Liu is referring to completely different subject matter and references a "testing and packing" component which is actually a tool kit with a set of alternative URLs of the same web source to debug the wrapper program of Liu. The format of the release version of the wrapper program is always the same format, namely, XML. Accordingly, Applicants respectfully submit that the Liu reference does not teach what is alleged and the claim is in condition for allowance.

Also, Applicants respectfully submit that the combination of Keith and Liu also do not appear to be properly combinable since Liu requires that the data being processed is HTML based. As such, this is not raw data that is in one of a plurality of different formats and actually Liu would not operate for its intended purpose if the data was not in HTML format since Liu appears to require HTML-based web information (see introduction of Liu).

The dependent claims add additional novel and non-obvious subject matter. For example, claim 11 requires that the knowledge container administrator module creates knowledge transformation information by extrapolating data from the raw data item and links the raw data item to the knowledge transformation information. The Office Action alleges that the extrapolation of data from a data item to create knowledge transformation information is taught in section 4.3, example three, of the Liu reference. However, this cited portion refers to the parse tree where leafs act as links. This representation merely illustrates that an HTML page may be organized in fields that are linked and this tree designation shows the actual information on the HTML page. There is no extrapolation of any raw data being performed. As such, there is no knowledge transformation information or any link to any extrapolated data from the raw data item, as alleged.

Accordingly, Applicants respectfully submit that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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